



Ciro Gaimari
Direct Dial: (312) 253-8636
Email: cgaimari@rblaw.net

July 19, 2019

Via US & Certified Mail

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U.S. Environmental Protection Agency, Region 5
Ralph Metcalfe Federal Building
77 West Jackson Blvd.
Chicago, IL 60604

Re: Techalloy
Southern Cal Chemical Company
PhibroTech
Dates of Incident: 1974-2019
Location of Incident: In and around Union, Illinois

To whom it may concern:

Our firm, Romanucci & Blandin LLC, represents Dana Harper regarding Techalloy, Southern Cal Chemical Company, and PhibroTech's continued noncompliance with federal and state regulations regarding emissions and/or polluting of neighboring land, air, and water in Union, Illinois. Upon information and belief, Techalloy, Southern Cal Chemical Company, and PhibroTech, three companies located in or around Union, Illinois, released and/or transferred into the surrounding environment amounts of chemicals significantly exceeding limits established by the US and Illinois Environmental Protection Agencies from 1974 up to and after the closing of the companies.

Pursuant to the provisions of the Freedom of Information Act, 5 ILCS 140/1, I am requesting information related to the release and/or transfer of chemicals into the environment by Techalloy, Southern Cal Chemical Company, and PhibroTech between 1974 and 2019.

Specifically, I am requesting any and all:

- 1) Complaints to McHenry County Cities and Villages regarding air and water pollution from 1974 to present;
- 2) Complaints to McHenry County Cities and Villages regarding Techalloy, PhibroTech, and/or Southern Cal Chemical Company from 1974 to present regarding air and/or water pollution;
- 3) Correspondence, reports, data, and citations for Techalloy, PhibroTech, and Southern Cal Chemical Company from 1974 to present;
- 4) Documentation showing increased levels of air and/or water pollution;
- 5) Documentation, purchase orders, work orders, and receipts for work concerning Techalloy, PhibroTech, and Southern Cal Chemical Company from 1974 to present; and
- 6) Documentation showing complaints, correspondence, citations, and communications from Evergreen Middle School to Union, Illinois and McHenry County, Illinois concerning air and water pollution.

I look forward to hearing from you in writing within five working days as required by the Act. I look forward to hearing from you in writing within five working days as required by the Act. Due to the time frame from which I am requesting documents, I acknowledge the vast amount of potential records and propose a rolling disclosure.

If you have any questions or need further information to locate the records, please do not hesitate to contact the undersigned directly at 312.253.8636. Thank you.

Sincerely yours,
ROMANUCCI & BLANDIN, LLC

Ciro Gaimari, Paralegal

321 North Clark Street | Suite 900 | Chicago, Illinois 60654
312.458.1000 | Fax: 312.458.1004 | Toll Free: 888.458.1145 | Email: info@rblaw.net
www.rblaw.net